

FRANCIS M. GREGOREK (144785)
gregorek@whafh.com
BETSY C. MANIFOLD (182450)
manifold@whafh.com
FRANCIS A. BOTTINI, JR. (175783)
bottini@whafh.com
RACHELE R. RICKERT (190634)
rickert@whafh.com

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
Symphony Towers
750 B Street, Suite 2770
San Diego, CA 92101
Telephone: 619/239-4599
Facsimile: 619/234-4599

Attorneys for Plaintiffs

[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CAROLYN A. GERIN and MARY
KATHLEEN HUGHES, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AEGON USA, INC., AEGON
FINANCIAL SERVICES GROUP, INC.,
AFSG SECURITIES CORPORATION,
PFL LIFE INSURANCE COMPANY,
AUSA LIFE INSURANCE COMPANY,
INC., WESTERN RESERVE LIFE
ASSURANCE CO. OF OHIO, and
BANKERS UNITED LIFE ASSURANCE
COMPANY,

Defendants.

) Case No. C 06 5407 (SBA)

)
)
) **STIPULATION AND [PROPOSED]**
) **ORDER REGARDING INITIAL**
) **DISCLOSURES, 26(f) REPORT AND**
) **CASE MANAGEMENT STATEMENT**

1 WHEREAS, this securities class action commenced on September 1, 2006;

2 WHEREAS, on September 1, 2006, the Court issued an Order Setting Initial Case
3 Management Conference and ADR Deadlines, and assigned this matter to the ADR Multi-Option
4 Program;

5 WHEREAS, the above-captioned complaint is governed by the provisions of the Private
6 Securities Litigation Reform Act ("PSLRA");

7 WHEREAS, lead plaintiff(s) and lead counsel have not yet been appointed;

8 WHEREAS, the parties previously filed a Stipulation and [Proposed] Order Granting
9 Relief From Automatic Referral to Assignment to the ADR Multi-Option Program; therefore,

10 IT IS HEREBY ORDERED as follows:

11 1. Within sixteen (16) days after either (a) the service of all answers or (b) the entry of
12 an order denying in whole or part any motion to dismiss, whichever date first occurs, the parties
13 shall meet and confer concerning initial disclosures, early settlement and a discovery plan; and

14 2. Within thirty (30) days after either (a) the service of all answers or (b) the entry of
15 an order denying in whole or part any motion to dismiss, whichever date first occurs, the parties
16 shall complete and serve initial disclosures or state objections in a Rule 26(f) Report and file the
17 Case Management Statement and the Rule 26(f) Report.

18 DATED: November 15, 2006

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
FRANCIS M. GREGOREK
BETSY C. MANIFOLD
FRANCIS A. BOTTINI, JR.
RACHELE R. RICKERT

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23 RACHELE R. RICKERT

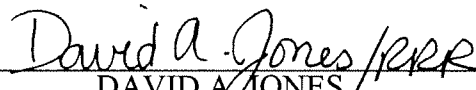
24 750 B Street, Suite 2770
25 San Diego, CA 92101
26 Telephone: 619/239-4599
27 Facsimile: 619/234-4599
28

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
DANIEL W. KRASNER
ROBERT B. WEINTRAUB
270 Madison Avenue
New York, New York 10016
Telephone: 212/545-4600
Facsimile: 212/545-4653

Attorneys for Plaintiffs

DATED: November 15, 2006

AKIN GUMP STRAUSS HAUER
& FELD LLP
DAVID A. JONES
DANIEL MCNEEL LANE, JR



DAVID A. JONES

300 Convent Street, Suite 1500
San Antonio, Texas 78205
Telephone: 210/281-7000
Facsimile: 210/224-2035

Attorneys for Defendants

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 12/4/06



HON. SANDRA B. ARMSTRONG
JUDGE, UNITED STATES DISTRICT COURT

AEGON:14246.STIP